

EXHIBIT 24

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Hon. Judith H. Ramseyer
KING COUNTY

SUPERIOR COURT CLERK

E-FILED

CASE NUMBER: 17-2-07094-7 KNT

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

FIRS HOMEOWNERS ASSOCIATION, *et al.*,

Petitioners,

v.

CITY OF SEATAC, *et al.*,

Respondents.

NO. 17-2-07094-7 KNT

Petitioners' REPORT to Court

TO: The COURT, and

TO: RESPONDENTS, other parties, and their respective attorneys:

By Order dated May 26, 2017, this Court granted petitioners' motion to continue the initial hearing herein six months to facilitate settlement negotiations among the parties. The Court's May 26, 2017 Order, in relevant part, provides that 1) the deadline for respondents to file their [opening] briefs is February 13, 2018; and 2) "Additionally, *on the dates set for filing opening briefs, responding briefs, and replies, any party may file a dispositive motion for hearing on that schedule (emphasis added).*"¹ Order, at page 3, lines 6-7.

¹ The next sentence of the Court's May 26, 2017 Order states: "Further, the Court's ruling does not address the notice of park closure Respondent Fife Motel has given to Petitioners." The SeaTac Municipal Code provides in relevant part that The Firs Mobile Home Park cannot be closed until after all Firs MHP residents are re-located. Kerry Lynch, Respondent Fife Motel's relocation specialist's updates establish that affordable dwelling units to accommodate Firs MHP residents are unavailable in King and Pierce Counties within 40 miles of The Firs MHP (The Firs HOA members seek to remain in the Firs MHP, or re-locate as a group to a location within the Highline School District.) Mr. Park cannot

1 Mr. Jong Park, on behalf of respondent Fife Motel, for months negotiated with
2 Sharon Lee, Executive Director, Low Income Housing Institute, for acquisition by LIHI of
3 the east one-half of the Firs MHP property. On Aug 7, 2017, Mr. Park abruptly terminated
4 negotiations, indicating he did not need the money and that instead of selling to LIHI, he
5 might want to develop rental housing himself on the eastern half of The Firs MHP
6 property.
7

8 On October 26, 2017, Walt Olsen (attorney for respondent Fife Motel) discussed
9 with Henry Lippek (of attorneys for petitioners) that Mr. Park offers to extend his closing
10 of The Firs MHP to December 31, 2017. Lippek responded that such an offer would
11 likely be unacceptable to petitioners because The Firs MHP cannot be closed until *after*
12 all Firs MHP residents are relocated, but possible acceptable variations were discussed.
13 Mr. Park was requested submit his offer in writing for consideration by petitioners. Mr.
14 Park declined to do so. Nevertheless, petitioners agreed to accept an agreement by Mr.
15 Park extending his notice of closure of The Firs MHP to February 13, 2018, subject to
16 further extension by agreement or Court order.
17

18 Instead of responding to petitioners' offer—precisely the status quo—Mr. Park
19 sealed the Firs MHP office rent depository and refused to accept November rent from
20 Firs MHP residents.
21

22 In response, Firs MHP residents rent is being collected by Mr. Barraza and held
23 in trust, pursuant to Washington State Bar Association rules governing client funds,
24 subject to disbursal by agreement or Court order.
25

26 lawfully close the Firs MHP until such time that all Firs MHP residents are in fact re-located. SMC
15.465.600 H. 1. 2. & 3.

Although, Mr. Park is so far refusing to negotiate with petitioners, but instead attempting to needlessly frighten vulnerable Firs MHP residents and their children, The Firs HOA is working to partner with government agencies, nonprofit organizations, unions, investors and others to acquire The Firs MHP by negotiations if possible or condemnation if necessary.

Acquisition of the Firs MHP is the preferred alternative, but if it proves infeasible, other alternatives being pursued are acquisition of an existing multifamily structure, and finally, acquiring land to construct new modular dwellings to accommodate all Firs HOA members as owners, not tenants. Each successive alternative will require more resources and time to complete.

Although each alternative will require multiple pieces to come together, it appears a combination of grants, in-kind assistance, loans, sweat equity and other resources can be assembled to achieve The Firs HOA objectives.

Respectfully submitted November 6, 2017.

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THE PUBLIC ADVOCATE

A NONPROFIT PROFESSIONAL SERVICES CORPORATION

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DECLARATION OF SERVICE

On the date entered below, the undersigned duly and properly delivered the foregoing report by email attachment to the following counsel of record in this matter:

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I certify under penalties of perjury that the foregoing is true and correct.
Signed at Seattle, WA on November 6, 2017.

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